UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

| LOGAN PAUL, | § | |
|------------------------------|---|--------------------------------|
| | § | |
| Plaintiff, | § | |
| | § | |
| v. | § | Civil Action No. 5:24-CV-00717 |
| | § | |
| STEPHEN FINDEISEN and COFFEE | § | |
| BREAK PRODUCTIONS, LLC, | § | |
| , , | § | |
| Defendants. | 8 | |
| - | § | |

<u>DEFENDANTS' UNOPPOSED MOTION TO EXTEND DEADLINE TO RESPOND</u> TO PLAINTIFF'S MOTION TO COMPEL

TO THE HONORABLE COURT:

Defendants Stephen Findeisen and Coffee Break Productions, LLC. (collectively, "**Defendants**"), file this Unopposed Motion to Extend Deadline to Respond to Plaintiff Logan Paul's Motion to Compel Documents Relevant to Defendants' Actual Malice and in support respectfully show:

- 1. On January 17, 2025, Plaintiff filed a Motion to Compel Documents Relevant to Defendants' Actual Malice seeking Defendants' production of privileged "communications between Paul and others, regarding Paul's involvement with the CryptoZoo project, that Defendants possessed when they published the libels at issue in this case." *See* ECF No. 26.
- 2. Given the importance of the privilege issues in the Motion to Compel, Defendants require additional time to respond to Plaintiff's Motion to Compel. Specifically, Defendants request an extension of one week, to January 31, 2025. Counsel for Defendants conferred with counsel for Plaintiff and Plaintiff is unopposed to the requested extension of time.

- 3. A court may, for good cause, grant a motion for an extension of time that is filed before the original time expires. Fed. R. Civ. P. 6(b)(1)(A); *McCarty v. Thaler*, 376 F. App'x 442, 443 (5th Cir. 2010).
- 4. This relief requested is sought not for the purposes of delay but so that justice may be done.

RELIEF REQUESTED

5. WHEREFORE, Defendants respectfully request the Court grant this unopposed Motion to Extend and extend Defendants' deadline to respond to Plaintiff's Motion to Compel to January 31, 2025.

Dated: January 20, 2025.

Respectfully submitted,

DAVIS & SANTOS, PLLC

By: <u>/s/ Caroline Newman Small</u>

Jason M. Davis

Attorney-In-Charge

Texas State Bar No. 00793592 Email: <u>jdavis@dslawpc.com</u> Caroline Newman Small Texas State Bar No. 24056037

Email: csmall@dslawpc.com

Rachel Garza

Texas State Bar No. 24125240

Email: <u>rgarza@dslawpc.com</u>

719 S. Flores Street

San Antonio, Texas 78204

Tel: (210) 853-5882 Fax: (210) 200-8395

Attorneys for Defendants Stephen Findeisen and Coffee Break Productions, LLC

CERTIFICATE OF CONFERENCE

I certify that on January 20, 2025, counsel for Defendants Stephen Findeisen and Coffee Break Productions, LLC conferred with counsel for Plaintiff Logan Paul and confirmed that this motion is unopposed.

/s/ Caroline Newman Small
Caroline Newman Small

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2025, the foregoing document was served on all counsel of record via the Court's ECF system.

/s/ Caroline Newman Small
Caroline Newman Small